

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No: 1:19-cr-10444 NMG
	)	
WILLIAM ANGELSECO,	)	

**DEFENDANTS SENTENCING MEMORANDUM**

**Background**

The defendant is 49 years old, married and the father of a two children, Nikolas and Anthony. He was raised by his mother and had no relationship with his biological father. As a young boy he was subjected to drugs and some violence in the home, however his mother got sober when he was about 13 years old and maintained a healthy and stable home. The defendant has a strong relationship with his mother whom he holds in high regard.

Mr. Angelesco is married and has been together with his wife since the age of 19. Unfortunately his wife struggles with a chronic opioid addiction. The defendant also has long standing drug abuse issues ranging from cocaine, crack cocaine and heroin. Although the defendant continues to struggle with his addictions he has had some success with treatment in the past. The defendant entered the Gavin House, an inpatient treatment facility in 2011. He remained in treatment and remained sober from 2011 through January of 2018 when he relapsed. He has been diagnosed with cocaine use disorder, opioid use disorder anxiety and depression. As a result of his addiction the defendant has overdosed three times, the most recent being in August of 2019.

Despite his struggles the defendant started and ran a successful clothing boutique and consignment store in Peabody, Massachusetts. Although not a stranger to the criminal justice system, prior to this matter he had remained sober and out of trouble since 2007. Moreover, the defendant has shown that he respects court orders and does well with a degree of supervision from the court. This is evidenced by the fact that in 2008 the defendant was sentenced to 10 years of probation as part of sentence from the Middlesex Superior Court. Mr. Angelesco remained sober and in compliance with the terms of his probation during that time. As a result of his compliance the court allowed his petition to terminate probation 1 year early.

Although drug use and addiction do not serve as a pass for criminality, it lends some insight into a clearer picture of the defendant and his past as well as the circumstances that lead to this matter. The defendant is described by his mother as a responsible and respectful man who always held a job. Also, while being held in this matter he has been described as being respectful towards staff and his peers. Lastly, facing serious charges in this court the defendant accepted responsibility for his actions and changed his plea to guilty very early in the prosecution.

#### Defendant's Recommendation

For all the aforementioned reasons and pursuant to 18 U.S.C. § 3553 the defendant respectfully requests this Honorable Court impose a sentence of twenty seven (27) months followed buy 2 years supervised release with the special conditions as recited on page 30 of the PSR. Lastly, the defendant requests that the Court recommend that he be accepted into the BOP's 500 hour Residential Drug Abuse Program.

Respectfully Submitted,  
William Angelesco,  
by counsel

/s/ *Carmine P. Lepore*

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July 16, 2020

**CERTIFICATE OF SERVICE**

I, Carmine P. Lepore, hereby certify that the above document was filed through the Electronic Court Filing system and served on all registered participants on July 16, 2020.

/s/ Carmine P. Lepore